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-and-

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*Attorneys for defendant Donald J. Trump*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

Civil Action No.: 1:20-cv-7311-LAK-JLC

**DECLARATION OF ALINA HABBA,  
ESQ. IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S  
MOTION IN LIMINE**

I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for Donald J. Trump (the "Defendant") in the above-captioned matter (the "Action").

2. I submit this declaration pursuant in support of Defendant's Memorandum of Law in Opposition to Plaintiff's Omnibus Motion *in Limine*. The facts herein are true and correct and, unless otherwise stated, are within my personal knowledge.

3. As counsel for Defendant, I have reviewed pleadings, and other documents related to the Action, and I am familiar with the facts and circumstances of this case.

4. Attached hereto as **Exhibit A** is a true and accurate copy of relevant portions of the deposition transcript of Natasha Stoynoff, which deposition took place October 13, 2022.

5. Attached hereto as **Exhibit B** is a true and accurate copy of the relevant portions of the deposition transcript of Jessica Leeds, which deposition took place on October 13, 2022.

6. Attached hereto as **Exhibit C** is a true and accurate copy of the Expert Rebuttal Report of Robert J. Fisher dated November 14, 2022.

7. Attached hereto as **Exhibit D** is a true and accurate copy of the relevant portions of the deposition transcript of Robert J. Fisher, which deposition took place on December 14, 2022.

8. Attached hereto as **Exhibit E** is a true and accurate copy of the relevant portions of the deposition transcript of E. Jean Carroll, which deposition took place on October 14, 2022.

9. Attached hereto as **Exhibit F** is a true and accurate copy of Plaintiff's Responses and Objections to Defendant's First Set of Interrogatories dated June 27, 2022.

10. Attached hereto as **Exhibit G** is a true and accurate copy of Plaintiff's Second Supplemental Rule 26(a)(1) Disclosures dated October 14, 2022.

11. Attached hereto as **Exhibit H** is a true and accurate copy of Plaintiff's Third Supplemental Rule 26(a)(1) Disclosures dated January 6, 2023.

Dated: February 23, 2023

Respectfully submitted,



Alina Habba, Esq.

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